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December 17, 2021

VIA ECF

The Honorable Nelson S. Román
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *Felicia Bramble v. Moody's Corporation, et al.*
Case No. 19-CV-5182 (NSR)

Dear Judge Román:

As you are aware, we represent Defendants Moody's Corporation ("Moody's") and Adam Berkowicz ("Berkowicz") (collectively, "Defendants") in the above-referenced matter.¹ Pursuant to Section 1(E) of Your Honor's Individual Practice Rules ("IPRs") and Your Honor's December 7 Order providing a briefing schedule for Defendants' Motion for Summary Judgment (the "Motion"), we respectfully request that Defendants' time to serve their moving papers be extended from January 6, 2022 to February 4, 2022; Plaintiff's time to oppose the Motion be extended from February 7, 2022 to March 7, 2022, and Defendants' time to reply to the Motion and file the Motion be extended from February 22, 2022 to April 1, 2022. Defendants are requesting this extension in light of our client's availability in light of the upcoming holiday, defense counsel falling ill, and to permit the parties to engage in exploring settlement options.

¹ We also represent Defendant Scott Kenney, Senior Vice President, Risk-Management, and Chief Audit Executive ("Kenney"); however, pursuant to a statement on the record during Kenney's deposition, the plaintiff agrees to voluntarily dismiss Kenney from her lawsuit, with prejudice.

MEMO ENDORSED

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This is Defendants' first request for an extension of time to file their moving papers for the Motion. Plaintiff's counsel has consented to this request.

Respectfully,

/s/ Amanda L. Van Hoose Garofalo

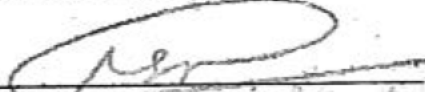
Amanda L. Van Hoose Garofalo

AVHG/frm

Defendants Moody's Corporation and Adam Berkowicz's ("Defendants") request for an extension of time (ECF No. 27) is hereby GRANTED as follows: Defendants' moving papers shall be served (not filed) on February 4, 2022; Plaintiff's response shall be served (not filed) on March 7, 2022; and Defendants' reply papers shall be served on April 1, 2022. Defendants shall file all motion papers (including Plaintiff's opposition) on April 1, 2022. Counsel shall provide two hard courtesy copies to the Court as their respective papers are served. The Clerk of Court is kindly requested to terminate the motion at ECF No. 27.

DATED: December 20, 2021
White Plains, NY

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE